Case 1:23-cv-00496-VSB Document 9APPIDICACTION ORLANTED

CLIFTON BUDD &

SO ORDERED No. BLA ATTORNEYS A VERNON S. BRODERICK

U.S.D.J. 1/25/2023

Defendant shall respond to Plaintiff's complaint by March 27, 2023.

THE EMPIRE STATE BUILDING 350 FIFTH AVENUE, 61ST FLOOR NEW YORK, NY 10118

> IAN-PAUL A. POULOS COUNSEL E-MAIL: IAPOULOS@CBDM.COM

> > January 24, 2023

VIA ECF

Hon. Vernon S. Broderick United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Courtroom 518 New York, New York 10007

> Bose v. Young Adult Institute, Inc d/b/a YAI Re:

> > Case No.: 23-cv-00496-VSB

Dear Judge Broderick:

This firm represents the Defendant in the above-referenced action. Pursuant to Paragraph 1(G) of Your Honor's Individual Rules & Practices in Civil Cases, the Defendant respectfully requests an extension of time to move, answer, or otherwise respond to the Complaint through and including Monday, March 27, 2023. In exchange, the Defendant agrees to waive improper service of process as a defense and hereby accepts service of the Complaint. This extension is necessary for the Defendant to investigate the facts and circumstances of the Plaintiff's Complaint.

Counsel for the Plaintiff consents to this request. Defendant has not made any previous requests for adjournment or extension.

Thank you for Your Honor's consideration.

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP

Attorneys for the Defendant

Ian-Paul A. Poulos

All Counsel of Record CC: